

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	MB Docket No. 04-233
Broadcast Localism)	

To: The Commission

COMMENTS OF JOINT BROADCASTERS

The mission of local broadcasters has always been to bring the highest level of service to local communities. Every year, local television stations evaluate the needs and interests of their viewers and provide thousands of hours of community-responsive programming to serve those particular needs. Dispatch Broadcast Group, licensee of WBNS-TV serving Columbus, Ohio, the 34th ranked Nielsen DMA, and WTHR-TV serving Indianapolis, Indiana, the 25th DMA; LIN Television Corporation, which operates 25 stations in markets from the 25th to the 106th; Midwest Communications, licensee of KFMB-TV serving San Diego, California, the 26th DMA; Paxton Media Group, Inc., licensee of WPSD-TV serving Paducah, Kentucky-Cape Girardeau, Missouri-Harrisburg-Mount Vernon, Illinois, the 79th DMA; Post-Newsweek Stations, with six stations in markets from the 10th to the 52nd; and Raycom Media, Inc., licensee of 35 stations in markets from the 16th to the 200th (collectively, "Joint Broadcasters"), recognize that local viewers are the lifeblood of their stations. In today's increasingly competitive multichannel world, continuing their long tradition of serving the particular needs of local viewers is the way these stations distinguish themselves in the programming realm. They are dedicated to finding out about their viewers' needs and determining better ways to serve them. The Joint Broadcasters submit these comments in

response to the Commission's *Notice of Inquiry*¹ to illustrate some of the many ways that local broadcasters have committed themselves to serving the goal of localism.

Before describing how broadcasters serve the goal of localism each and every day, it is important to explore what localism is. In the *Notice*, the Commission suggested that localism is the "overarching goal of establishing and maintaining a system of local broadcasting that is responsive to the unique interests and needs of individual communities."² As discussed in more detail below, broadcasters serve this goal in countless ways that cannot be pigeonholed into discrete categories -- by among other things providing critical information in times of local weather and other emergencies, offering in-depth coverage of local and state political races, airing programming that is responsive to the needs of underserved and minority communities and providing programs that are responsive to particular issues, problems and interests in local communities. Particularly with respect to the latter, local programming need not be locally produced to be responsive to community needs, and the Joint Broadcasters agree with the Commission

that programming that is not specifically targeted to the local community may still serve the needs and interests of the community. A program, for example, that discusses teenage drinking generally may be highly relevant to a particular community even though it is not produced specifically for that community or tailored to its particular problems in this area.³

As illustrated in the attached exhibits from the Joint Broadcasters, each of which provides a mere sampling of the many initiatives and programs these broadcasters' stations

¹ In re *Broadcast Localism*, Notice of Inquiry, MB Docket No. 04-233 (rel. July 1, 2004) ("*Notice*").

² *Id.* ¶ 4.

³ *Id.* ¶ 14.

regularly undertake, local television stations are deeply committed to serving the needs of their local communities, and this should come as no surprise, since local viewers are what sustain local broadcast television stations. The result is a symbiotic relationship between local stations and their viewers -- one in which stations evaluate the needs of their viewers and provide them with the most relevant, up-to-date and community-responsive information, and viewers depend on broadcasters as their primary source of local news, information and entertainment.

As the attachments demonstrate, one of the times when viewers depend most on their local stations, and when local broadcasters are able better than any other resource to provide the most relevant and up-to-date information, is during national or weather-related emergency situations. Post-Newsweek's Florida and Texas-based stations and Raycom's WFLX in West Palm Beach, Florida, air annual hurricane specials and provide hours of continuous coverage when hurricanes threaten their viewing areas. Last year, KFMB-TV provided critical, continuous coverage of the largest wildfire disaster in San Diego history, including an always up-to-date "ticker" with current information about evacuation, fire movement and other issues -- coverage that earned the station the coveted Edward R. Murrow Award. Furthermore, immediately after the fires, the station organized a phone bank for the American Red Cross that raised more than \$40,000 for victims of the fires. During a 2003 tornado outbreak, WPSD-TV preempted regular programming to provide its viewers with three consecutive hours of emergency-related weather coverage leading up to, during and after the tornado threat.

Local television broadcasters consider it their obligation to provide coverage of local and statewide political events and races, and their programming ranges from airing debates and in-depth interviews with candidates to town meetings, open forums and other programs designed to educate and inform voters about political issues. WBNS-TV's "Show You Care and

Vote” program, for example, showcases local, state and federal candidates as well as key political issues and this year included four live pre-election specials in the month leading up to the election. All of Post-Newsweek’s stations offer free airtime to candidates, and with Ohio as a battleground state in the 2004 Presidential election, LIN’s WDTN and Raycom’s Ohio stations have covered live every visit to their respective areas by President Bush and Senator Kerry. During the week leading up to Election Day 2004, KXAN-TV expanded its usual 30 minute 6 p.m. newscast to an hour to better discuss and explore contested races and issues. The station also produced 15 to 20 minute interviews with 24 federal, state and local candidates, which it made available to viewers in their entirety on the station’s website. Raycom’s WMC-TV has taken the lead in encouraging local viewers to vote by serving as the main media sponsor and partner with Vote Memphis, a coalition of groups including the League of Women Voters and the NAACP devoted to registering new voters and getting them out to vote.

Local stations also serve their communities by providing locally-produced entertainment programming and services that showcase local talent. Post-Newsweek stations KPRC-TV, WDIV, WJXT and WKMG-TV, for example, twice each year conduct and televise the multi-part series “Gimme the Mike,” a talent contest for local singers. KPRC-TV also broadcasts the Miss Texas pageant, and WJXT annually co-produces “Straight Talk,” an hour-long program about teens and sex, with the Jaguar Foundation. Many stations air local high school, college and professional sporting events such as local minor league baseball games that otherwise would not be picked up by any other programming service.

Community responsiveness is evident in the numerous ways that local stations meet the needs of students in their areas by covering events for and about students. KFMB-TV, for example, has partnered with the Safe School Unit of the San Diego County Office of

Education to work with students on conflict resolution and reducing violence on school campuses. This award winning program is coupled with monthly news stories and public service announcements on the station. LIN stations WWLP and WVBT-TV produce and air a high school quiz program, while WFLI-TV broadcasts the annual local spelling bee and the teacher excellence awards. WAVY-TV's half-hour program "Kid Talk" is directed at children between the ages of 10 and 18. It features 20 to 25 students from a school in the local community and a guest expert to offer professional input on a topic of interest or importance to children. Each year, KFVS helps send local minority children to visit Washington, DC and highlights the youngsters in interviews from the nation's capital. Other stations conduct annual fundraising drives to purchase school supplies for students and teachers. This year, WKMG-TV's "A Gift for Teaching" campaign provided \$100,000 in school supplies to area teachers, KFMB-TV's "Backpack for Kids" initiative collected more than 6,000 backpacks and school supplies for local foster children, WAFB helped collect school uniforms for underprivileged children, WAVY-TV's "Operation School Supplies" collected more than 44,000 items for local students and WVBT-TV's "Reading Roundup" collected almost 4,000 books for children living in underserved areas and in shelters.

Relying on both on-air and off-air resources, local broadcasters are an important source of information about issues that are important to the health, education and vitality of the local community. KFMB-TV has joined with the University of California, San Diego Cancer Center and the Susan G. Komen Breast Cancer Foundation to start the "Buddies for Life" program, which includes public service announcements on breast health care and an email reminder service to women about monthly breast self exams and new stories related to breast cancer. WJXT has partnered with the local Sheriff's department and The Justice Coalition to

produce a monthly prime time crimestoppers program that has been credited with getting 30 criminals off Jacksonville streets. WAFF established a fundraising campaign to help the families of two local police officers gunned down in the line of duty. The campaign, which lasted for several weeks, began with a drop-off site for donations featured in live reports on the station every hour throughout the day and raised more than \$150,000. KPRC-TV produced a 30-minute documentary and held a 60-minute town meeting on the 50th anniversary of *Brown v. Board of Education*. WVBT-TV's innovative weekly "Families First" program takes an issue of importance to the local community and examines it from three different perspectives in a half-hour. WXIX-TV has teamed up with the Cincinnati Youth Collaborative and Empower Media to recruit mentors for local students in the greater Cincinnati area. The comprehensive effort includes bi-weekly news segments, PSAs and three half-hour specials each year featuring the education, achievements and recruitment of mentors.

Stations also provide valuable programming and services to underserved and minority communities in their viewing areas, as well as increase community awareness about issues relating to minorities and the underserved. In December 2004, KFMB-TV will air the "Urban Flix Holiday Special," an entertainment magazine special featuring interviews with the hottest urban Latino motion picture, music and television stars; behind-the-scenes sneak previews of upcoming urban-targeted movies, TV shows and music videos; urban award shows and special events. The magazine is an important example of how programming that is not locally-produced can promote the goal of localism by serving the needs and interests of a particular segment of a station's community. WDIV recently produced and broadcast a critically acclaimed 60-minute prime time special exploring race relations and candidly examining relationships among different ethnic groups in the Detroit metropolitan area and ways to bring

these different groups of people together. WSTM-TV has produced and aired the half-hour program “City Scene,” discussing issues of relevance to the local African-American community, and “Entre Vecinos,” focusing on local Spanish-speaking viewers.

It is important to recognize that stations’ contributions to their local communities are not limited to on-air programming. As well-regarded members of their communities, broadcasters use the public airwaves to unite people and to organize and promote fundraisers to assist segments of the local population. Such activities provide tremendous benefit and should not be discounted when considering broadcasters’ contributions to localism. There are countless examples of stations serving their local communities by participating in and promoting important community events. WBNS-TV has organized drives to collect cell phones for victims of domestic violence and each year raises money to help needy local families, while WAVY-TV’s “Coats for Kids” drive collected more than 12,000 new and gently used coats for local children. KSAT-TV will air public service announcements for any local agencies or community groups that request time, and WDIV will not only air public service announcements but frequently produces them for local organizations at no charge. Raycom’s KXRM-TV has twice held “Trick or Treat Street” for the local community, a free, safe Halloween event for Southern Colorado children and their families, and WTVM has sponsored “Thunder on the Hooch,” a free, day-long Independence Day celebration consisting of rides, games, entertainment and fireworks that attracts more than 50,000 people from the local community. The centerpiece of WPSD-TV’s community outreach is its annual 15-hour “Telethon of Stars,” a partnership with area Lion’s Clubs now in its 48th year on television, which has raised more than 10 million dollars to benefit centers serving special needs children and adults in the station’s four state service area.


Local broadcasters' dedication to serving the needs of their local communities is illustrated by the many outreach efforts they voluntarily undertake to communicate with viewers and assess their needs and interests. WBNS-TV commissioned four separate polls to gauge viewers' perspectives on the campaign issues most important to them as part of its "Show You Care and Vote" political coverage. KFMB-TV has run phone banks and set up a link on its website to solicit viewer ideas for stories. WKMG-TV and WDIV offer "MeTV," automated video booths installed in public places throughout the community where viewers can record 30 seconds of their thoughts and opinions on any subject. WDIV's website, which is the most viewed in Detroit, also offers a forum for viewers to express their opinions on news stories and local issues, communicate with the station about its coverage or offer other comments, and many other stations also dedicate portions of their websites to seeking viewer input. These examples showcase stations' deep commitment not only to providing local programming, but also to ensuring that such local programming is responsive to viewers' interests and needs.

* * *

The examples above and the many more described in the attached exhibits are only a small sampling of the activities local broadcast stations currently undertake to serve localism and ensure that the particular needs and interests of local viewers are met in a wide variety of ways. The breadth of activities described in the attachments demonstrates some of the many ways that local television stations, when given appropriate flexibility as longtime residents in their respective communities, determine the best ways to tailor their services and build on their experience to meet community needs and interests. Giving broadcasters the freedom to do what they do best has led and will continue to lead to the availability of more diverse offerings that reflect the differing needs of various communities. Broadcasters' ability to be responsive to their

local audiences should not be hampered by subjecting them to cookie-cutter requirements or requiring them to shoehorn their efforts into particular government mandated narrow and restrictive categories. Serving local communities as a whole, as well as specific groups within them, is essential as local broadcast stations work to distinguish themselves from the sometimes hundreds of other programming options available to viewers in a multichannel world, and local stations will therefore continue to remain steadfastly committed to serving all of their viewers. The Joint Broadcasters therefore urge the Commission to be mindful of the many benefits that have flowed from a flexible and open approach to localism rather than a regimented, government-dictated scheme.

Respectfully submitted,



Jennifer A. Johnson
Amy L. Levine
COVINGTON & BURLING
1201 Pennsylvania Ave., N.W.
Washington, D.C. 20004-2401
(202) 662-6000 (phone)
(202) 662-6291 (fax)

Counsel to Joint Broadcasters

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WBNS-10TV – Commitment to Localism

Since its founding in 1949, WBNS-TV has worked to meet the unique interests of the people of Central Ohio. Local viewers have responded by making WBNS-TV the most watched news channel in the heart of Ohio. Following are just a few representative examples of WBNS-TV's commitment to serving the needs of its local viewers.

- ***Connecting To Local Students***

- WBNS-TV has a long history of using its broadcast spectrum to reach local students. When extreme cold forced the closure of many Central Ohio schools in 1977, WBNS-TV took the initiative to communicate with students at home through the public airwaves. Going beyond lesson assignments and announcements, WBNS-TV offered four hours every weekday morning to teach students by television.

- ***Covering Issues Of Importance To The Community***

- In November 2003, WBNS-TV aired an hour-long special “Breaking the Cycle: A 10TV Town Hall Meeting with Dan Rather,” which was broadcast live in prime time from the Columbus Children’s Hospital. The station aired this program in response to the more than 3 million incidents of physical and emotional abuse reported nationally in 2001, including more than 3,000 cases in Franklin County alone, to shed light on the pervasive problem of domestic violence.

- ***Connecting Viewers To The Political Process***

- In October, WBNS-TV aired four “Show You Care and Vote, Voice of the Voter” town hall meetings. These live broadcasts were held in four key central Ohio counties during four different 10TV Eyewitness News broadcasts to increase voter awareness of issues; educate voters on the electoral process and provide local, state and federal candidates with an open forum to reach voters. In connection with this program, WBNS-TV commissioned four separate polls in these counties to gauge voters’ perspectives on the presidential election and the issues that matter to them. Also as part of the “Show You Care and Vote” campaign, WBNS-TV aired public service announcements and distributed nearly 30,000 interactive CD-ROMS that included information about how to use voting machines and candidate platforms to incoming college freshmen, middle and high school students and civic groups.
- From October 4 through Election Day, WBNS-TV provided a new “Issues and Answers” segment as part of its news, on statewide news outlet Ohio News Network and on WBNS’s website to give local, state and federal candidates a forum to discuss issues affecting voters. Each Presidential, congressional and local candidate was given the opportunity to tape a one minute response to a campaign issue determined by WBNS, and each candidate was also allowed to tape a one minute segment addressing an issue of his or her choice.

- WBNS-TV works with The League of Women Voters and the Franklin County Consortium for Good Government to bring election night information to the communities of Central Ohio. Station employees and volunteers also worked with The League of Women Voters and the Ohio Secretary of State's office to sign up nearly 1,000 unregistered voters across the state.
- ***Participating In The Community***
 - Through WBNS-TV's "Show You Care" program, the station takes an active and extensive involvement in the communities it serves, participating in hundreds of public service campaigns throughout the year. For example:
 - *10TV Family Fund.* The 10TV Family Fund is a non-profit organization that raises money throughout the year to feed needy Central Ohio families during the holidays. In 2003, the Family Fund fed over 4,500 families in 19 counties.
 - *Cell Phone Collection.* WBNS-TV collects used cell phones for domestic violence victims and raises public awareness to help eliminate domestic violence in Central Ohio.
 - *Just Say No Rally.* The Just Say No March and Rally is an annual celebration of the year-long commitment made by local elementary and middle school students to live drug, alcohol and tobacco free lives. As many as 3000 students are expected to attend this year's rally in downtown Columbus.
 - *Literary Council.* WBNS was the media sponsor for this fundraiser for the Columbus Literary Council.
- ***Bringing Local Sports To The Fans***
 - WBNS-TV is Central Ohio's source for the popular Ohio State University Men's Basketball and Big Ten sports.

LIN Television Corp. – Commitment to Localism

The 23 full-power television stations operated by LIN Television Corporation (“LIN”) exemplify local broadcasters’ ability to use innovative and flexible means to meet the needs of their communities. Following are representative examples from some of LIN’s stations – KXAN-TV, Austin, Texas; WANE-TV, Fort Wayne, Indiana; WAVY-TV and WVBT-TV, Portsmouth, Virginia; WDTN(TV), Dayton, Ohio; WLFI-TV, Lafayette, Indiana; WPRI-TV and WNAC-TV, Providence, Rhode Island; WTNH-TV and WCTX(TV), New Haven, Connecticut and WWLP(TV), Springfield, Massachusetts – that demonstrate the commitment of LIN’s stations to meet the unique and diverse needs of the communities they serve.

- ***Keeping The Community Informed***

- WAVY-TV offers more than 31 hours of local news, weather and sports programming each week, WWLP provides over 30 hours and WDTN offers over 27 hours.
- When Hurricane Isabel hit the WAVY-TV and WVBT-TV viewing areas in September 2003, the stations broadcast wall-to-wall coverage, providing 18 1/2 hours of coverage on the day the storm hit and 13 1/2 hours the following day. WAVY-TV also aired a three-hour special and telethon nine days after the storm that raised more than \$254,000 for the American Red Cross Disaster Relief Fund.
- KXAN-TV was highly involved in the development and implementation of the AMBER Alert system for Central Texas.
- KXAN-TV has aired 30-minute programs to keep viewers informed about topics of importance to them, including teen pregnancy and sex education, freelancing in Austin and local GED programs. From 1978 to 2000, the station produced and aired the “Senior Forum,” a 30-minute program addressing issues relating to senior citizens.

- ***Showcasing Local Schools***

- Every Saturday evening, WWLP airs “Schools Match Wits,” a locally-produced high school quiz program featuring students from high schools in the Springfield area that has been on the air for the last 44 years.
- WVBT-TV produces and broadcasts the high school quiz show “Battle of the Brains” each Saturday night.
- On the weekly “Friday Night Frenzy” segment of its local newscast, WLFI-TV devotes significant resources to cover 16 high school sports games in the Lafayette area, including regular highlights of typically overlooked sports like volleyball and softball.
- WAVY-TV’s half-hour long “Kid Talk,” the second-highest rated locally-produced community affairs program in the market, is designed to give youths between the ages of 10 and 18 a voice in issues that are interesting or important to

them. Each week, 20 to 25 students from a local school discuss topics with a guest expert who provides professional input. The program also includes Kids Tips and Parent Tips to help with family discussions of topics.

- WLFI-TV's newscasts include the segments "The High Five," which honors high school students for community and school achievements, and "Lafayette's Greatest," which recognizes local valedictorians. WLFI-TV also names a "High School Athlete of the Week" and provides "Battle of the [High School] Bands."
- WLFI-TV televises the annual "Golden Apple Awards," for local teaching excellence, as well as the local spelling bee.
- WLFI-TV crews travel all over the county to bring Purdue University sporting events to local fans in Lafayette.

- ***Reaching The Local Electorate***

- With Ohio as a battleground state in the 2004 Presidential election, WDTN has covered every visit by President Bush and Senator Kerry to its area live.
- For the week leading up to Election Day 2004, KXAN-TV expanded its usual 30 minute 6 p.m. newscast to an hour to better discuss and explore contested races and issues. The station also produced 15 to 20 minute interviews with 24 federal, state and local candidates, which were made available to viewers in their entirety on the station's website.
- During local election seasons, WTNH-TV, WCTX and WLFI-TV regularly host local candidate debates and forums.

- ***Providing Local Sports***

- KXAN-TV broadcasts local AAA baseball team Round Rock Express games.

- ***Meeting The Religious Interests Of The Community***

- For nearly 50 years, WWLP has aired the Chalice of Salvation Roman Catholic Mass each Sunday. Many residents in Springfield who cannot otherwise attend Mass find this to be an invaluable service.
- WWLP broadcasts "Real to Reel," a half-hour magazine program featuring community interest stories, including stories about religion, charitable organizations, and education.
- WAVY-TV each week tapes and airs "Spread A Little Sunshine," a program specific to the local religious community.

- ***Keeping The Community Connected***

- WWLP airs “Showcast,” a daily program featuring local businesses, civic groups and non-profit organizations. Each entity is allotted approximately eight minutes to highlight their product, service, cause or organization.
- WAVY-TV’s weekly half-hour program “Bottom Line,” the top-rated locally-produced community affairs program in the market, includes three seven-minute segments offering interviews with representatives from various community groups and organizations.
- WVBT-TV’s weekly “Families First” program takes a particular issue of interest to the local community and in a half-hour considers it from three different perspectives.
- WDTN’s website is a comprehensive resource for the community, offering local and national news, weather, entertainment and sports as well as information about special events in the community. The interactive “Community Calendar” feature allows viewers to post their own events.

- ***Giving Back To The Community***

- Each year, WWLP telecasts the Children’s Miracle Network Telethon in association with Baystate Medical Center in Springfield.
- Each year KXAN-TV broadcasts the United Negro College Fund Telethon and KXAN-TV and WANE-TV air the Muscular Dystrophy Association Telethon.
- WLFI-TV provides promotional support and public service announcements to literally hundreds of local community groups.
- This year, WDTN will hold its 21st annual “Coats for Kids” drive, which has to date collected and cleaned more than 400,000 coats for underserved children. The station’s “Food for Friends” campaign, now in its 22nd year, has donated more than 4 million food items to community members in need.
- WPRI-TV and WNAC-TV are active in the summer Special Olympics games held each year at the University of Rhode Island, as well as the related winter sports celebrity carnival. The stations also support charity walks for causes ranging from breast cancer to diabetes to domestic violence by producing and running PSAs and featuring the events on the stations’ weekly Community Calendars.
- WVBT-TV’s “Reading Roundup” collects new and gently used books for children in need. This year the station gathered almost 4,000 books.
- WAVY-TV’s annual “Operation School Supplies” drive this year collected more than 44,000 items for local students. Its “Coats for Kids” operation collected over 12,000 coats for families in need.

KFMB-TV – Commitment to Localism

Since its founding, KFMB-TV has worked hard to serve the interests of its viewers in Southern California. Among other things, KFMB-TV has developed a number of initiatives that combine community involvement with news stories and cross-promotion on the station. KFMB-TV is proud of its strong commitment to serving local viewers as illustrated below in the representative examples of the kind of programming and services it provides to the local community.

- ***Combining Community Involvement With Raising Community Awareness***
 - In the wake of shootings at Columbine, Santana and Granite Hills high schools, KFMB-TV's Local 8 News has partnered with the Safe Schools Unit of the San Diego County Office of Education in F.O.R.C.E. 8 (Focus on Resolving Conflict Everyday) to prevent youth violence and underage drinking. A Local 8 employee has been trained in conflict resolution by the Safe Schools Unit and helps instruct area high schoolers and middle schoolers in conflict resolution, violence reduction and youth leadership. Local 8 News also airs monthly stories that have become a forum for students to discuss issues relating to violence. F.O.R.C.E. 8 was awarded the PROMAX Gold Medallion award for best community service project in the country, as well as the California State School Board Association's prestigious Golden Bell Award for its effort in fostering school safety.
 - KFMB-TV, the University of California, San Diego Cancer Center and the Susan G. Komen Breast Cancer Foundation have teamed up to create "Buddies for Life," an educational awareness project for the prevention and treatment of breast cancer. Each month, Local 8 News airs breast cancer-related stories and reminds viewers to choose a "buddy" and participate in breast self-exams. KFMB-TV airs daily public service announcements on breast health care and has created an e-mail reminder service with the Cancer Center for monthly breast self-exams. The comprehensive "Buddies for Life" webpage on KFMB-TV's website also provides educational information on breast cancer and includes links to all major breast cancer organizations nationwide. KFMB-TV was the media sponsor for the Susan G. Komen 3 Day Breast Cancer Walk on October 1-3, 2004, which helped raise 6.7 million dollars for breast cancer research, treatment and support services, and is the media sponsor of the Susan G. Komen Race for The Cure on November 7, 2004.
 - Through the "Volunteer 8" program, KFMB-TV teams up with Volunteer San Diego to recruit volunteers for San Diego County's hundreds of non-profit organizations. This initiative includes airing monthly news stories about the efforts of local volunteers and the differences they have made in the community, as well as daily public service announcements to recruit and match volunteers to non-profit organizations. In April 2004, KFMB-TV hosted Family Volunteer Day, in which more than 1,000 volunteers participated in 26 countywide restoration projects. In September 2004, Volunteer 8 recruited hundreds of volunteers to assist San Diego Meals on Wheels in serving more than 1,000 local

seniors and increasing the organization's volunteer base. KFMB-TV also provides information about volunteer opportunities on its website. Volunteer 8 is a recipient of the National Points of Light Foundation Award.

- On November 4, 2004, KFMB-TV will offer "Super Shredder Day" for the community. Working with a local shredder company, the station will provide shredders for public use at various locations around the county, accompanied by a series of news stories teaching viewers how to protect themselves from identity theft. KFMB-TV will provide additional information and resources on its website.
- KFMB-TV's "Backpack for Kids" initiative was a joint project with the San Diego Child Abuse Prevention Foundation to collect backpacks for children in San Diego County's foster care system. The station promoted the drive through public service announcements and news stories and collected more than 6,000 backpacks and school supplies for local foster children.

- ***Covering Issues Of Importance To Local Viewers***

- Last year, KFMB-TV provided critical, continuous coverage of the largest wildfire disaster in San Diego history, including a continuously updated "ticker" with the most current information about evacuations, fire movement and other crucial data -- coverage that earned the station a coveted Edward R. Murrow Award. Immediately after the fires, the station organized a phone bank for the American Red Cross that raised more than \$40,000. Local 8 News also conducted an investigation into the failure of local officials to activate the Emergency Broadcast System during the fires, prompting a series of meetings between broadcasters and local emergency officials that has resulted in improved disaster communication for the public.
- In July 2004, Local 8 News covered live the entire ceremony for the homeporting of the nation's newest aircraft carrier, the U.S.S. Reagan, including the docking of the ship, dedication speeches and the disembarkation of the crew as they were reunited with their families.
- KFMB-TV locally produces hour and half-hour long programs focusing on the history, topography and diversity of San Diego County. In these programs, Local 8 News's anchors journey through the county, visiting the spectacular sights such as San Diego's award-winning artistic community, breathtaking mountain and desert communities and cultural and culinary diversity that have defined San Diego as "America's Finest City."

- ***Providing Service To Underserved And Minority Students And Viewers***

- KFMB-TV's Cool School program encourages students and educators to nominate their class or school as a Cool School to be featured on Local 8 News.

The station makes an effort to highlight progress of students in disadvantaged and underserved communities.

- Each week a Local 8 News meteorologist travels to an area school in his “Microclimate Van” to teach students about the weather and discuss weather phenomena and climatic conditions of San Diego County, making an effort to visit underserved sections of the station’s viewing area.
- In December 2004, KFMB-TV will air the “Urban Flix Holiday Special,” produced by Connection III Entertainment. The program is a holiday entertainment magazine special featuring interviews with the hottest urban Latino motion picture, music and television stars; behind-the-scenes sneak previews of upcoming urban-targeted movies, TV shows and music videos; urban award shows and special events.

- ***Connecting Viewers To The Political Process***

- In the week before Election Day 2004, Local 8 News focused each day on one of San Diego’s four mayoral candidates with in-depth interviews to assess each candidate’s platform and vision for the San Diego. The previous week, the station provided daily coverage of both sides of local and statewide ballot propositions.

- ***Bringing Local Sports To The Fans***

- Each football season, KFMB-TV produces and airs hours of programming related to the San Diego Chargers, including the weekly “Chargers Game Plan,” pre- and post-game shows, a draft day and training camp shows and pre-season games.
- In August 2004, KFMB-TV aired the locally-produced half-hour special “Charger Girls 2004: From Cabo to Kick Off,” documenting the cheerleaders’ five month journey from auditions, training and the making of the Charger Girl swimsuit calendar in Cabo San Lucas to the team’s first home game at Qualcomm stadium. The program also focused on stereotypes and misconceptions about NFL cheerleaders and the Charger Girls’ function as role models and fundraisers in the San Diego community.

- ***Viewer Involvement In Station Coverage***

- In July 2003, KFMB-TV began asking its viewers for story ideas. The result has been a wide variety of stories, covering everything from a feature “behind the scenes at Local 8” to medical stories to an investigation of a new skate park that was built along a main road with no safe crossing area for children.
- In October 2004, Local 8 News solicited ideas from viewers about dangerous traffic areas in their neighborhoods. Viewer responses are being used to create a series of news stories that will investigate these areas and work with police and residents to slow traffic and correct other traffic problems.

WPSD-TV – Commitment to Localism

As one of a handful of television stations in the United States that has remained under its original local ownership since commencing broadcasting in 1957, WPSD-TV, Paducah, Kentucky, has maintained a strong commitment to programming designed to meet the specific needs and interests of the viewers in its service area. WPSD-TV's ownership, management and staff have built a strong relationship with the local community over a 47-year period of service, and their dedication is evident in a wide variety of the station's programming activities, a small sampling of which are summarized below.

- ***Keeping Viewers Informed***

- Promoting itself as "NewsChannel 6," WPSD-TV continues to expand its commitment to news coverage throughout its service area, which is the only Nielsen Designated Market Area that encompasses portions of four states. The station's success in meeting the needs and interests of its viewer base is validated by ratings in westernmost Kentucky that indicate that approximately 85 percent of televisions in operation at 6:00 p.m. on weeknights in this region are tuned to WPSD-TV's local newscast.
- WPSD-TV's newscasts frequently originate from the site of a major local event, such as the American Quilter's Society convention and the Barbecue on the River in Paducah, Kentucky and the Herrinfesta Italiana in Herrin, Illinois.
- WPSD-TV provides coverage of noteworthy meetings of city and county governmental bodies, including school boards, and offers comprehensive coverage of election returns.

- ***Providing Weather-Related And Emergency Information***

- WPSD-TV is proud to be known as the "Weather Authority" based on the strength of its weather coverage. The station's policy is to interrupt regular programming immediately if a severe thunderstorm or tornado warning is issued for any county served by the station. During a May 2003 tornado outbreak, the station provided viewers with three consecutive hours of emergency-related weather coverage leading up to, during and after the tornado threat.

- ***Serving Local Students***

- WPSD-TV's strong commitment to local school athletics is exemplified by "Gridiron Glory," which provides coverage of high school football games throughout the station's four state service area. The program features taped highlights of between 10 and 12 games weekly and also covers high school soccer, volleyball, and track and field events. The

station also reports on high school basketball regular season and tournament events.

- WPSD-TV covers the activities of four local universities that are members of the NCAA's Division I and sends crews to regular season contests and tournament games that are held in distant venues.
- As part of its educational and informational programming and to highlight the diversity of local residents, WPSD-TV features a program where the host interviews people of many different races who serve as role models for youth who discuss how they achieved success in their professions.

- ***Connecting With The Local Community***

- In January, 2004, WPSD-TV broadcast a three-hour program documenting the history of the Civil Rights movement and issues that confront minorities today.
- WPSD-TV airs two 30-minute programs each quarter addressed to children and their parents that tackle specific social issues and problems confronting the area's youth. The station has also partnered with local schools to disseminate information about these topics, including available community resources.
- In 2004, WPSD-TV aired a series of programs that were also broadcast on local public television stations highlighting the redevelopment of a historic neighborhood in Paducah, Kentucky, the station's community of license.
- The centerpiece of WPSD-TV's community outreach is its annual 15-hour "Telethon of Stars," a partnership with area Lion's Clubs now in its 48th year on television, which has raised over 10 million dollars to benefit centers serving children and adults with special needs in the four states comprising the station's service area.
- "Cal's Coats for Kids" under the leadership of WPSD-TV's chief meteorologist Cal Sisto, has resulted in the donation of thousands of coats for children over an 18-year period.

Post-Newsweek Stations – Commitment to Localism

The six broadcast television stations operated by Post-Newsweek Stations, Inc. (“PNS”), including KPRC-TV, Houston, Texas; KSAT-TV, San Antonio, Texas; WDIV(TV), Detroit, Michigan; WJXT(TV), Jacksonville, Florida; WKMG-TV, Orlando, Florida and WPLG(TV), Miami Florida are dedicated to finding creative ways to provide community-responsive programming to their viewers. All PNS stations also reflect their deep commitment to localism by providing weekly editorials and free airtime to political candidates. The examples below comprise a small fraction of the many ways that PNS’s stations serve the unique and diverse needs of their local communities.

- ***Informing Local Audiences***

- PNS stations take pride in providing significant amounts of local news, weather and sports programming each week, on average in excess of 27 hours per week on each station. WJXT broadcasts at least 47 hours of such programming each week.
- WJXT locally produces a monthly prime time program developed in partnership with the local Sheriff’s department and The Justice Coalition to help curtail crime and provide safety information to the local community. The program has been credited with getting 30 criminals off of Jacksonville streets since April 2003.
- WJXT responds to local issues with live forums. Recently, the station produced a live town meeting about failing schools in Duval County, where principals, teachers, parents and students presented all sides of a complicated community issue. Annually, WJXT and the Jaguars Foundation co-produce “Straight Talk,” an hour-long program about teens and sex.
- KPRC-TV produced a 30-minute documentary and held an hour-long town meeting on the 50th anniversary of the Supreme Court’s decision in *Brown v. Board of Education*. The station also produced and ran a 60-minute documentary on Houstonian George H.W. Bush on the occasion of his 80th birthday.
- In 2003, WDIV created, hosted and aired “Connecting With Kids Family Forum With John Walsh,” an hour-long program examining current issues facing children.
- WDIV annually broadcasts the local America’s Thanksgiving Parade for three hours on Thanksgiving morning, including coverage of the charity preview event and additional coverage in preview specials and on the news.
- WKMG-TV airs a special preview program before the Florida Film Festival, as well as daily news stories and PSAs, to help viewers decide which films are of interest to them. The festival credits the station for a substantial increase in attendance.

- ***Providing Essential Information About Weather-Related And Other Emergencies***

- When hurricanes threatened Jacksonville in the summer of 2004, WJXT provided 65 hours of storm coverage that received Olympics-level ratings. The station also partnered with the American Red Cross to staff information hotlines and helped solicit donations for storm victims.
- WPLG provides emergency service information through hourly updates to viewers, hurricane preparedness specials and continuous coverage once hurricane warnings are issued for its community.
- KPRC-TV broadcasts an annual hurricane special produced in Florida but localized by the station's Chief Meteorologist. During Tropical Storm Allison in 2001, KPRC-TV was on the air live and uninterrupted for hours covering the devastation to the local community.
- KSAT-TV covers breaking news and weather during natural disasters ranging from floods to fires to hurricanes. The station's meteorologists have traveled hundreds of miles to chase hurricanes as they approach the Gulf Coast.
- WDIV stayed on the airwaves during the mayhem of the summer 2003 blackout and kept the local community informed, reassured and in touch with live reports from across the region.

- ***Showcasing Local Talent***

- KPRC-TV, WDIV, WJXT and WKMG-TV each produce the multi-part series "Gimme the Mike," a talent contest for local singers.
- KPRC-TV airs the annual "Miss Texas" pageant, which is produced by an outside company but co-hosted by a KPRC on-air personality.

- ***Informing Local Voters About Candidates And Public Affairs***

- All PNS stations offer free airtime to local candidates in the form of "Straight Talk from the Candidates," an hour-long program that allows candidates to address voters directly and unedited.
- WDIV's weekly 30-minute public affairs program, "Flashpoint," is popular with Detroit residents and others concerned about the most topical political issues. Guests regularly include Michigan Governor Jennifer Granholm, Detroit Mayor Kwame Kilpatrick, congressional representatives and top leaders of local counties, who are interviewed about the decisions they make that directly affect the local community.
- WPLG produces and airs "This Week in South Florida," a news interview and public affairs program featuring discussions among government officials and other noteworthy guests about various topics of local interest.

- ***Highlighting Local Sports***

- WJXT broadcasts a live prime time program featuring high school football games in the North Florida/South Georgia region on Friday nights.
- Since 1995, WJXT has produced “End Zone,” a live Monday night football show hosted by a Jaguar’s player and the station’s sports director.
- KSAT-TV offers “Instant Replay,” a local sports program showcasing local high school, college and professional sports teams.

- ***Serving Viewers’ Religious Interests***

- For more than 30 years, KSAT-TV has broadcast live services from the First Baptist Church in San Antonio and routinely covers special programs held at the local Catholic Chancery.
- WJXT produces and airs “Sunday School Forum,” the longest running local religious program in the country.

- ***Connecting With The Community***

- WKMG-TV and WDIV offer “MeTV,” automated video booths installed in public places throughout the community where viewers can record 30 seconds of their thoughts and opinions on any subject. The spots are edited and run throughout the day on the stations.
- WDIV’s website is the most viewed in Detroit and among other things offers a forum for viewers to express their opinions on news stories and local issues, communicate with the station about its coverage or offer compliments.
- WPLG produces and airs vignettes profiling prominent members of the community and significant historical events during Black History Month and Hispanic Heritage Month.
- WDIV’s recent critically acclaimed 60-minute prime time “Flashpoint” special explored race relations, candidly examining differences among races in metro Detroit and ways to bring people together.
- Each year KPRC-TV broadcasts the United Negro College Fund Telethon, which it was the first station in the country to carry.
- KSAT-TV will air public service announcements for any local agencies or community groups that request airtime. WDIV not only provides airtime to local community groups but also produces many PSAs at no charge.
- Each August, WKMG-TV runs the month-long benefit campaign “A Gift for Teaching,” which provides free school supplies to area teachers. This year’s effort raised \$100,000.

Raycom Media's Stations – Commitment to Localism

The 35 full-power broadcast television stations operated by Raycom Media, Inc. are strongly committed to serving their respective local communities by providing top-notch newscasts and critical weather-related and other emergency information while also providing a wide mix of community-responsive programming. Station efforts described below are just a handful of the countless ways that Raycom's stations serve the needs and interests of their local viewers each and every day.

- ***Serving Viewers Through News And Local Public Affairs Programming***

- All of Raycom's stations take pride in providing significant amounts of local news, weather and sports programming each week. Raycom's stations also each air weekly editorials addressing issues of importance to the local community.
- The weekly "Tucson's Most Wanted" feature on KOLD-TV, Tucson, Arizona, offers information, reenactments and outreach to the public to help capture people wanted for criminal activity and has contributed to over 50 arrests in less than three years of operation.
- Many of Raycom's stations offer weekly segments during their newscasts that highlight local events, people or places of interest in their communities. For example, KSLA-TV, Shreveport, Louisiana, produces and runs "Made in the ArkLaTex"; WDAM-TV, Moselle, Mississippi, provides "Pride of the Pine Belt"; WNWO-TV, Toledo, Ohio and WTNZ(TV), Knoxville, Tennessee produce "Our Town"; and WPBN-TV/WTOM-TV, Traverse City and Cheboygan, Michigan offer "Made in Northern Michigan."
- For almost 30 years, KTVO(TV), Kirksville, Missouri, has produced and aired the weekly half-hour program "Around the Heartland," featuring local community leaders discussing important community issues.
- This year, WAFF(TV), Huntsville, Alabama, used the occasion of its 50th anniversary to present programs addressing the history of broadcasting in the station's community. "Fifty Years of Weather" revisited historic local weather events and advances in weather technology. Another program documented the history of local children's television and included the station's recreating and staging a children's television show at a local children's arts festival.
- WFLX(TV), West Palm Beach, Florida, produces and airs "Eye On South Florida," a weekly half-hour program covering local issues such as healthy living, safety, economic development, local history, the environment and education.
- WLUC-TV, Negaunee, Michigan, produces and airs the half-hour program "The Ryan Report," which takes an in-depth look at local issues in Michigan's Upper Peninsula, on Sunday mornings.

- WFLX produces and airs the “Kid’s on Being a Kid” feature in which a news anchor has conversations with young teens regarding peer pressure and the issues they confront every day, such as early sex, drugs and alcohol.
- ***Providing Service During Weather-Related And Other Emergencies***
 - Each fall and spring, WAFF hosts “StormTeam Road Tours,” weather seminars in cities throughout the station’s viewing area to educate people about staying safe in severe weather, that have attracted hundreds of participants.
 - Prior to this year’s hurricane season, WFLX ran two locally-produced half-hour specials covering topics such as preparing for hurricanes, protecting pets, handling evacuations and avoiding home repair con artists. After recent storms, the station assisted the Red Cross of Palm Beach in reaching out to people in need of assistance, as well as people who could assist others impacted by the storm.
- ***Providing Programming Responsive To Community Needs And Interests***
 - Last year, KHNL(TV)/KFVE(TV), Honolulu, Hawaii, addressed local concerns about teens using crystal methamphetamine by coordinating with other stations in the market to simultaneously broadcast during prime time a documentary about the issue. KHNL/KFVE followed that program with an hour-long show featuring teens discussing this issue.
 - For over 40 years, WLUC-TV has produced and aired the one-hour weekly program “Finland Calling,” the only Finnish language program in the United States to serve its vibrant Finnish community.
 - WMC-TV, Memphis, Tennessee, produced a one-hour documentary to coincide with the 35th anniversary of the assassination of Dr. Martin Luther King that examined the history and impact of this event from a local perspective.
 - WSTM-TV, Syracuse, New York, has produced several half-hour shows addressing issues of importance to the local community. “City Scene” discussed issues relating to the local African American community, “Entre Vecinos” focused on the local Spanish-speaking community and “Our Community” addressed issues of general community interest.
 - WOIO(TV)/WUAB(TV), Cleveland, Ohio, produces and broadcasts a weekly half-hour program entitled “Around the Block,” which focuses on issues of interest to local viewers such as the economy, health, arts and matters affecting area youth.
 - KWWL(TV), Waterloo, Iowa, produced and aired the “Speaking of Women’s Health” special, a 30-minute program highlighting women’s health concerns.

- ***Offering Political Coverage***

- Raycom's stations frequently provide live, wall-to-wall coverage when presidential candidates campaign in their viewing areas, and many produce and air local candidate debates.
- This year, KTVO hosted a local candidate forum, including exhibits and presentations from all county level candidates and a debate among candidates for Missouri State Representative.
- WMC-TV was the main media sponsor and partner with Vote Memphis, a coalition of groups including the League of Women Voters and the NAACP devoted to registering new voters for the 2004 elections and getting them out to vote.

- ***Covering Local Sports***

- KASA-TV, Albuquerque, New Mexico, produces and airs the New Mexico State High School Basketball Championships for all five divisions of boys and girls, from "A" to "AAAAA."
- For the past 22 years, KHNL/KFVE has been the home of University of Hawaii sports. The stations televise over 120 sporting events annually, including many "minor" sports, such as women's soccer, softball, volleyball and basketball, to help promote Title IX and gender equity.
- For the 17th consecutive year, WTOG-TV, Savannah, Georgia, is broadcasting a live, weekly, 45-minute series "High School Football Scoreboard."
- WAFB(TV), Baton Rouge, Louisiana, produces and airs "Sportline Friday Night," an hour-long sports program highlighting local football games.

- ***Emphasizing Local Students***

- WXIX-TV, Cincinnati, Ohio, has teamed up with the Cincinnati Youth Collaborative and Empower Media to recruit mentors for six year olds through college aged students in the greater Cincinnati area. The collaboration includes bi-weekly news segments on all station newscasts, PSAs and three half-hour specials each year featuring the education, achievements and recruitment of mentors.
- Each year, KFVS-TV, Cape Girardeau, Missouri, helps send local minority children to visit Washington, DC. The youngsters are highlighted in interviews from the nation's capital by two news photographers who chaperone the event and develop news stories that run after the trip.
- WAFB annually helps collect school uniforms for underprivileged students.

- ***Serving Local Communities Through A Combination Of On-Air And Off-Air Activities***
 - This year, WAFF established a fundraising campaign to help the families of two police officers gunned down in the line of duty in Athens, Alabama. The campaign began with a drop-off site for donations that was featured in live reports on the station every hour throughout the day. The campaign lasted for several weeks and collected more than \$150,000 for the “Officers’ Memorial Fund.”
 - WECT(TV), Wilmington, North Carolina, sponsors “Buddy Check 6,” a monthly feature that reminds women to call a buddy and encourage them to do a breast self exam.
 - Each year since 1998, WTVM(TV), Columbus, Georgia, has sponsored “Thunder on the Hooch,” a free day-long Independence Day Celebration consisting of rides, games, entertainment and fireworks that attracts more than 50,000 people from the local community.
 - KXRM-TV, Colorado Springs, Colorado, developed and presented the First and Second Annual Trick or Treat Street for the local community, a free, safe Halloween event for Southern Colorado children and their families.
 - Since 1999, WTVM, in association with the Muscogee County Medical Foundation, has provided a day-long health expo where viewers can get free medical screenings for prostate cancer, blood pressure, cholesterol, blood sugar and skin cancer.